

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

<b>SAMUEL HOUSTON,</b>	)	
	)	
	)	
	)	
<b>Plaintiff,</b>	)	<b>Civil Action No.</b>
<b>v.</b>	)	<b>CV 06-243-MEF</b>
	)	
<b>ARMY FLEET SERVICES, LLC.,</b>	)	
	)	
<b>Defendants.</b>	)	

**JOINT MOTION FOR ENTRY OF QUALIFIED  
HIPAA PROTECTIVE ORDER**

Plaintiff Samuel Houston and Defendant Army Fleet Services, LLC. move this Honorable Court to enter the attached order to govern the production and protection of certain Protected Health Information ("PHI") so that the parties, and any third party receiving any subpoena, may comply with the Health Insurance Portability and Accountability Act of 1996 ("HIPAA"). As grounds for this motion, the parties state:

1. In this action, the plaintiff is seeking relief pursuant to, *inter alia*, The Family and Medical Leave Act and the American With Disabilities Act. Certain healthcare records relevant to the plaintiff's claims are maintained by third parties and subject to HIPAA. These records may be relevant and responsive to many

discovery requests and the parties wish to comply with HIPAA while conducting efficient and economical litigation.

2. The proposed HIPAA order is attached hereto. Both parties believe that this order will provide for the efficient production of documents and compliance with HIPAA.

WHEREFORE, PREMISES CONSIDERED the parties request this Court to enter the attached order.

Respectfully submitted this 9<sup>th</sup> day of January, 2007.

/s/ Jimmy Jacobs (with consent)

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